

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,
Plaintiffs,
v.

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

Date: September 30, 2022

**AFFILIATE DEFENDANTS’
MOTION FOR CLARIFICATION OF THE COURT’S
SEPTEMBER 20, 2022 ORDER [ECF 184]**

Defendants Planned Parenthood Gulf Coast, Inc. (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), Planned Parenthood San Antonio, Inc. (“PP San Antonio”) (collectively, “Affiliate Defendants”) move that this Court clarify its September 20, 2022 Order [Dkt. 184] to clarify that Relator’s Motion to Compel is granted only as to the requests discussed in Relator’s Third Motion to Compel and analyzed in the Court’s

Order, and that the Order (1) requires Affiliate Defendants to make good faith efforts to identify and produce documents relevant to Requests for Production 1, 2, 3, 4, 5, 6, 7, 8 and 9 by searching the emails of custodians determined by Affiliate Defendants to likely have documents related to Medicaid, but does not require that Affiliate Defendant collect and search all available ESI of every employee during the 2010 through 2022 period; (2) does not require Affiliate Defendants to produce documents responsive to RFP 10; and (3) does not require Affiliate Defendants to produce documents responsive to RFP 11 that do not relate to federal, Texas, or Louisiana Medicaid.

WHEREFORE, Affiliate Defendants respectfully move that this Honorable Court clarify its September 20 Order.

Dated: September 30, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER
LLP

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Cameron County, Inc., and Planned
Parenthood San Antonio, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar

Tirzah S. Lollar